PREET BHARARA
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA, Plaintiff, - v. - ALL RIGHT, TITLE AND INTEREST IN THE REAL PROPERTY AND APPURTENANCES THERETO KNOWN AS 35-37 EAST BROADWAY, NEW YORK, NEW YORK 10002 LISTED AS BLOCK 280, LOT 42 IN THE OFFICE OF THE COUNTY CLERK AND REGISTER OF NEW YORK COUNTY, NEW YORK, Defendant-*in-rem*.	:	12 Civ. 4034 (HB)

DECLARATION OF ALEXANDER WILSON

ALEXANDER WILSON, pursuant to the provisions of 28 U.S.C. § 1746, declares as follows:

1. I am an Assistant United States Attorney in the office of Preet Bharara, United States Attorney for the Southern District of New York. I am the Assistant United States Attorneys responsible for representing the United States of America (the "Government") in the

above-referenced case. I respectfully submit this declaration in support of the Government's Motion for Summary Judgment (the "Motion").

2. Attached to this declaration are exhibits relevant to the Motion, each of which is described below.

3. Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the February 11, 2013 deposition of Damon Leong.

4. Attached hereto as Exhibit 2 is a true and correct copy of the Lease produced to the Government by Claimant Won & Har Realty Corporation ("Won & Har").

5. Attached hereto as Exhibit 3 is a true and correct copy of a document labeled Assignment and Assumption of Leases, Rents and Security Deposits, dated October 14, 2006, and Commencement Date Memorandum and Confirmation of Lease Terms, dated October 14, 2008, produced to the Government by Won & Har.

6. Attached hereto as Exhibit 4 is a true and correct copy of the Claim filed in this action by David Gao.

7. Attached hereto as Exhibit 5 is a true and correct copy of the Claim filed in this action by Hua Chen.

8. Attached hereto as Exhibit 6 is a true and correct copy of the Response to Government's First Set of Interrogatories and Document Requests by Won and Har, dated December 20, 2012.

9. Attached hereto as Exhibit 7 is a true and correct copy of the Government's First Set of Interrogatories and Document Requests to Won & Har, dated November 20, 2012.

10. Attached hereto as Exhibit 8 is a true and correct copy of the transcript of the March 6, 2013 and March 7, 2013 deposition of Connie Chen.

11. Attached hereto as Exhibit 9 is a true and correct copy of the transcript of the March 5, 2013 and March 13, 2013 deposition of Ni Ji Xiong.

12. Attached hereto as Exhibit 10 is a true and correct copy of the transcript of the March 7, 2013 and March 13, 2013 deposition of Zheng Fen.

13. Attached hereto as Exhibit 11 is a true and correct copy of the August 25, 2011 letter from TYT East Corp. to Won & Har Realty Corp. enclosing Surrender Agreements.

14. Attached hereto as Exhibit 12 is a true and correct copy of Government Exhibit 2 from the March 6, 2013 deposition of Connie Chen, a lease between TYT East Corp. and Chinatown # 2 Gaming Corp.

15. Attached hereto as Exhibit 13 is a true and correct copy of Won & Har Realty Corp.'s 2008 U.S. Corporation Income Tax Return.

16. Attached hereto as Exhibit 14 is a true and correct copy of the Verified Complaint filed by The City of New York against 37 East Broadway on October 4, 2011.

17. Attached hereto as Exhibit 15 is a true and correct copy of the Stipulation of Settlement between The City of New York and Won & Har Realty Corporation, dated November 22, 2011.

18. Attached hereto as Exhibit 16 is a true and correct copy of the Stipulation of Settlement between The City of New York and TYT East Corp., dated November 15, 2011.

19. Attached hereto as Exhibit 17 is a true and correct copy of Won & Har Realty Corp.'s Petition filed in the TYT East Corp. eviction proceeding, dated May 23, 2012.

20. Attached hereto as Exhibit 18 is a true and correct copy of the Decision and Judgment entered on August 31, 2012 in favor of Won & Har Realty Corp. against TYT East Corp.

21. Attached hereto as Exhibit 19 is a true and correct copy of the Warrant of Eviction, dated February 14, 2013 evicting TYT East Corp. from 35-37 East Broadway, New York, New York.

22. Attached hereto as Exhibit 20 is a true and correct copy of a July 20, 2011 letter from Dean K. Fong, Esq. to the New York City Police Department.

23. Attached hereto as Exhibit 21 is a true and correct copy of Notice to Cure sent by Won & Har to TYT East Corp, dated August 1, 2011.

Dated: New York, New York
March 18, 2013

PREET BHARARA
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Attorney for the United States of America

By: ______________________
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